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January 11, 2005

BY HAND

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications
and Energy
One South Station, 2nd Floor
Boston, MA 02110

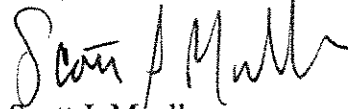
Re: D.T.E. 04-84-Comments of Fitchburg Gas and
Electric Light Company d/b/a Unitil

Dear Secretary Cottrell:

Enclosed for filing please find the original Comments of Fitchburg Gas and
Electric Light Company d/b/a Unitil in the above-captioned proceeding.

Please feel free to contact me if you have any questions in regard to this matter.

Respectfully submitted,



Scott J. Mueller
Counsel for Fitchburg Gas and
Electric Light Company

cc: George Yiankos, Director, Gas Division (3)
Caroline M. Bulger, Esq., Hearing Officer (1)
Joseph Rogers, Assistant Attorney General (1)

SJM/pfg

B99710

bcc: Karen Asbury, Unitil
Doug Debski, Unitil
Patricia M. French, NiSource

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Petition of Competitive Energy Services – Massachusetts, LLC)	
for the Department of Telecommunications and Energy to)	
require local gas distribution companies to make)	D.T.E. 04-84
available to licensed gas agents and suppliers certain)	
information about commercial and industrial natural)	
gas customers, including capacity assignment numbers.)	

**INITIAL COMMENTS OF FITCHBURG GAS
AND ELECTRIC LIGHT COMPANY d/b/a UNITIL ("UNITIL")**

Pursuant to the Department's Notice of Filing and Request for Comments, Unitil hereby submits its written comments in the above-captioned proceeding.

Unitil is not opposed to the Petition by Competitive Energy Services – Massachusetts, LLC which seeks to require local gas distribution companies to make available to licensed gas agents and suppliers certain information about commercial and industrial natural gas customers, including capacity assignment numbers, *providing* that the Department requires the same terms and conditions under which this information would be provided as required for information about electric customers. See Investigation into Competitive Market Initiatives, D.T.E. 01-54-A (10-15-2001) and D.T.E. 01-54-B (7-30-2001).

The petition requests the same information be provided for gas customers as is currently provided for electric customers, plus one additional piece of information – the capacity assignment number. To that end, it is important that any Order requiring gas distribution companies to provide customer information lists for their gas customers include the same stringent requirements as those for the electric distribution companies. Specifically, Unitil requests that the Department require the following:

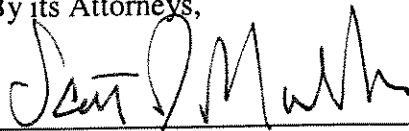
1. Customer information lists should include name, address, and rate class (plus capacity assignment number).
2. Customer information lists should be formatted consistently, be made available in electronic format, and be updated on a quarterly basis.
3. The customer information list should only be made available to a limited number of qualified entities.

4. Rate class information should be provided such that income level is not disclosed. This would apply if the lists are broadened to include residential customers. Discount rate classes should not be distinguished from regular rate classes.
5. Customer account numbers should not be included in the customer information lists.
6. A unique customer identifier other than account number should be used to track customers from one customer information list revision to the next revision.
7. Customer information lists should include customers on both default service and competitive supply.
8. Customer information lists should include meter read cycles.
9. Customers should have the ability to opt – out of any customer information lists.
10. Suppliers/marketers/brokers should be required to use only the most recent quarterly version of the customer information lists in order to honor the most recent opt – out requests.
11. Payment and credit history information should not be included in the customer information lists.
12. Customer information lists should not be filtered to remove customers with late payment histories.

Respectfully submitted,

FITCHBURG GAS AND
ELECTRIC LIGHT COMPANY d/b/a
UNITIL

By its Attorneys,

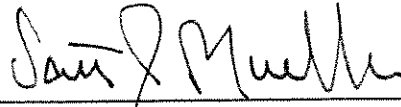


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Dated: January 11, 2005

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing document upon the Department of Telecommunications and Energy and parties of record in accordance with the Department's Notice of Filing and Request for Comments in D.T.E. 04-84.

A handwritten signature in black ink, appearing to read "Scott J. Mueller", is written over a horizontal line.

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Dated: January 11, 2005

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